

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JANE DOE, on behalf of JOHN DOE, her
minor child,

Plaintiff,

v.

MARTY SMALL, SR., in his official
capacity as Mayor of Atlantic City, New
Jersey, and individually,

LA'QUETTA SMALL, in her official
capacity as Former Principal of Pennsylvania
Avenue School, and individually,

BARRY CALDWELL, in his official
capacity as current Superintendent of the
Atlantic City School District,

PAUL A. SPAVENTA, in his official
capacity as former Interim Superintendent of
the Atlantic City School District,

ATLANTIC CITY BOARD OF
EDUCATION, a public entity, and

KAYAN AHMED FRAZIER, an individual,

Defendants.

Civil Action No.: 1:21-cv-11189

**REQUEST TO ENTER DEFAULT AS TO
DEFENDANT, MARTY SMALL, SR.**

TO CLERK:

Please enter upon the docket the default of the Defendant, Marty Small, Sr., in the
above-entitled action for failure to plead or otherwise defend as provided by the rules of the

Court or by an Order of this Court, or because the Answer of the Defendant has been stricken.

LENTO LAW GROUP, P.C.



TERRELL A. RATLIFF, ESQUIRE

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Attorney for Plaintiff

TRIAL COUNSEL

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JANE DOE, on behalf of JOHN DOE, her
minor child,

Plaintiff,

v.

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Defendants.

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**CERTIFICATION IN SUPPORT OF
REQUEST TO ENTER DEFAULT
AGAINST DEFENDANT,
MARTY SMALL, SR.**

I, Terrell A. Ratliff, Esquire, certifies as follows:

1. I am the attorney for the Plaintiff, Jane Doe on behalf of John Doe, her minor child.
2. The Complaint and Summons in this action were served upon the Defendant, Marty Small, Sr., as appears from the Affidavit of Service filed with the Court. See attached Exhibit "A".
3. The Defendant, Marty Small, Sr., has failed to answer the Complaint in this matter and the Defendant, Marty Small, Sr., has not otherwise moved for an extension to Answer.

I certify that the foregoing statements made by me are true. I am aware that if any of the

foregoing statements made by me are willfully false, I am subject to punishment.

LENTO LAW GROUP, P.C.



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Attorney for Plaintiff

TRIAL COUNSEL

EXHIBIT “A”

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JANE DOE,
Plaintiff

V.

SUMMONS IN A CIVIL CASE

MARTY SMALL, SR, ET AL.,
Defendant

CASE
NUMBER: **1:21-CV-11189-RMB-SAK**

TO: *(Name and address of Defendant):*

Marty Small, Sr.
Office of the Mayor
4121 Atlantic Avenue
Atlantic City, New Jersey 08401

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States Agency, or an office or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:


**Lento Law Group
3000 Atrium Way
Suite 200
Mt. Laurel, New Jersey 08054**

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

s/ WILLIAM T. WALSH
CLERK



ISSUED ON 2021-05-13 17:04:55. Clerk
USDC NJD

RETURN OF SERVICE		
Service of the Summons and complaint was made by (print):	DATE:	6/13/2021
NAME OF SERVER (PRINT):	TITLE:	MICHAEL WHITMAN Courier
Check one box below to indicate appropriate method of service:		
<p>Served personally upon the defendant. Place where served: <u>1300 ATLANTIC AVE ATLANTIC CITY NJ</u></p> <p>Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.</p> <p>Name of person with whom the summons and complaint were left: <u>Rosalind (Security)</u></p> <p>Returned unexecuted: _____</p> <p>Other (specify): _____</p>		
STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL
DECLARATION OF SERVER		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.</p>		
Executed on	6/13/2021 Date	 Signature of Server
<p style="text-align: center;">Address of Server:</p> <p style="text-align: center;">Road Runner Courier Service Inc. 708 E Main Street Moorestown NJ 08057</p>		



ROAD RUNNER

COURIER SERVICE, INC.

708 E. MAIN STREET, MOORESTOWN, NJ 08057

Office: (856) 428-7500 ♦ Fax: (856) 428-7510

Web: roadrunner1st.com

Docket #

1:21-cv-11189

Case Name:

Jane Doe, et al v. Small, Sr. et al

Summons & Complaint

Date

6/3/21

Place (Name & Address)

Marky Smith &

Served On (Print Name & Title)

Michael

(Manner of Service)

Personal - Home Delivery

Served by (Print Name)

Michael Smith

Title:

Owner

DECLARATION OF SERVER

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made are willfully false, I am subject to punishment.

Executed on :

6/3/21

Signature of Server:

Marky Smith

708 E. Main Street

Moorestown, NJ 08057